## REMARKS

I.     **REJECTION TO CLAIMS 1, 4-5, 8-9, 12-13, 16-17, 20-21, 24 AND 33-35 UNDER 35 USC 103(A) AS UNPATENTABLE OVER BRADSHAW IN VIEW OF CHENG; CLAIMS 6, 14 AND 22 UNDER 35 USC 103(A) AS UNPATENTABLE OVER BRADSHAW IN VIEW OF CHENG, FURTHER IN VIEW OF BIRDWELL; CLAIMS 7, 15 AND 23 UNDER 35 USC 103(A) AS UNPATENTABLE OVER BRADSHAW IN VIEW OF CHENG, FURTHER IN VIEW OF JORGENSON; AND CLAIMS 25, 28-29 AND 32 UNDER 35 USC 103(A) AS UNPATENTABLE OVER BRADSHAW IN VIEW OF CHENG, FURTHER IN VIEW OF DILLON ARE IMPROPER**

The Examiner, in Response to Arguments in paragraph 25 of the Office Action, maintains his argument that Bradshaw discloses several interfaces. Specifically, the Examiner contends that Bradshaw is interpreted as encompassing the interface that receives data from the interface and permits translation of data from one protocol to another (i.e., terminal interface). Applicants respectfully disagree.

Bradshaw teaches or suggests a hub station that transmits data over a satellite link to remote units. In Fig. 10, a remote unit is illustrated in more detail. In Fig. 10, the remote unit includes a receiver system with a standard DVB receiver and a converter. The DVB receiver receives a data signal from, for example, the hub. The converter receives the DVB data signal and converts it to a MAC data format, which can then be communicated to a LAN via a LAN interface. Thus, the receiving system in Bradshaw teaches only processing data received from the hub, not processing data for transmission to the hub (i.e., not ready for transmission). Additionally, there is no description or illustration of a transmitter unit, let alone *an interface directly between a transmitter unit and any component of the receiving system*. In fact, the only transmitter discussed in Bradshaw is implemented in the hub station (see, Bradshaw, Fig. 8).

In Fig. 8 of Bradshaw, the transmitter includes an internet interface and a converter. The internet interface is implemented for receiving data in a MAC format, and the converter converts the MAC data to a DVB data signal suitable for transmission from the hub. Although the transmitter appears to convert data suitable for transmission to the hub (e.g., DVB), there is no teachings of a receiver unit in the transmitter, let alone a receiver unit that converts data to a format ready for transmission to the hub.

Therefore, in summary, there is nothing in Bradshaw that teaches or suggests a transmitter unit and receiver unit in the same device (e.g., terminal or hub). Additionally, nothing in Bradshaw teaches or suggests *an interface directly between a receiver unit and transmitter unit of a terminal*, let alone a receiver unit that provides data to the transmitter unit (via the terminal interface) already in a format ready for transmission. Conversely, in the present invention, a single terminal (i.e., ground terminal) includes both a receiver unit and a transmitter unit communicating *via a terminal interface*. The receiver unit performs a translation of data into a format supported by the hub, and provides the data to the transmitter unit in format ready for transmission via the terminal interface.

Cheng fails to overcome the deficiencies noted above in Bradshaw. Cheng teaches a method and apparatus that separates network-dependent functions from network-independent functions in set-top boxes (STBs). Although the apparatus in Cheng appears capable of receiving satellite inputs, there is nothing in the reference that teaches or suggests a receiver unit that translates data to a format supported by a hub, wherein the data is provided to a transmitter unit via a terminal interface in format ready for transmission.

Moreover, Birdwell and Jorgenson also do not appear to overcome the deficiencies noted above in Bradshaw and Cheng. Accordingly, even if one of ordinary skill in the art were to combine the teachings of Bradshaw, Cheng, Birdwell and Jorgenson, the combination still would not teach or suggest all the features recited in independent claims 1, 9, 17 and 25 (as amended). In particular, the combination fails to include a terminal interface directly between a receiver unit and transmitter unit in a terminal, wherein the receiver unit provides

translated data to the transmitter unit via the terminal interface in a format ready for transmission.

Finally, Dillon is a §102(e)-type reference being applied in a §103(a) rejection, and can be removed as prior art under either the American Inventor's Protection Act or the CREATE act. More specifically, *Dillon and the present invention were commonly owned by or were subject to assignment to the same entity at the time the present invention was made.* Thus, the Applicants respectfully request that this reference be removed as prior art.

In light of the above, Applicant respectfully submits that claims 1, 4-9, 12-17, 20-25 and 28-32 of the present application are both novel and non-obvious over the art of record. Accordingly, Applicant respectfully requests that the rejections under 35 U.S.C. §102 and §103 be withdrawn and a timely Notice of Allowance be issued in this case. If any fees are due in connection with this application as a whole, the Examiner is authorized to deduct such fees from deposit account no. 02-1818. If such a deduction is made, please indicate the attorney docket number (115426-531) on the account statement.

Respectfully submitted,

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